

JASON M. FRIERSON
United States Attorney
Nevada Bar No. 7709
ZACHARY BERKOFF-CANE, WSBN 47988
Special Assistant United States Attorney
Office of the General Counsel
Social Security Administration
6401 Security Boulevard
Baltimore, MD 21235
Telephone: (410) 966-1542
Facsimile: (415) 744-0134
E-Mail: zachary.berkoff@ssa.gov

Attorneys for Defendant

UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA

MYRA R. ANZALDO,

Plaintiff,

v.

KILOLO KIJAKAZI,
Acting Commissioner of Social Security,

Defendant.

Case No. 2:23-cv-00196-BNW

**UNOPPOSED MOTION FOR
EXTENSION OF TIME
(FIRST REQUEST)**

Defendant Kilolo Kijakazi, Acting Commissioner of Social Security (Defendant) respectfully requests that the Court extend the time for Defendant to respond to Plaintiff's Motion for Reversal and/or Remand (Dkt. No. 18), currently due on July 31, 2023, by 30 days, through and including August 30, 2023. Defendant further requests that all subsequent deadlines be extended accordingly.

This is Defendant's first request for an extension of time. Good cause exists for this extension due to Defendant's counsel's workload as described below. Defendant's counsel has completed five briefs in the past thirty days, and has another seven district court briefs and one Ninth Circuit brief pending in the next thirty days.

1 Additional time is required to review the record, to evaluate the numerous issues raised in
2 Plaintiff's motion, to determine whether options exist for settlement, and if not, to prepare Defendant's
3 response to Plaintiff's motion. Defendant's counsel will endeavor to complete these tasks as soon as
4 possible. This request is made in good faith and with no intention to unduly delay the proceedings,
5 and counsel apologizes for any inconvenience.

6 On July 25, 2023, counsel for Defendant conferred with Plaintiff's attorney, who has no
7 opposition to this motion.

8 It is therefore respectfully requested that Defendant be granted an extension of time to respond
9 to Plaintiff's Motion for Reversal and Remand, through and including August 30, 2023.

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11 Dated: July 25, 2023

Respectfully submitted,

12 JASON M. FRIERSON
13 United States Attorney

14 /s/ Zachary Berkoff-Cane
15 ZACHARY BERKOFF-CANE
16 Special Assistant United States Attorney

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18 IT IS SO ORDERED:

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20 UNITED STATES MAGISTRATE JUDGE

21 DATED: July 26, 2023
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CERTIFICATE OF SERVICE

I, the undersigned, am a citizen of the United States and am at least eighteen years of age. My business address is 6401 Security Boulevard, Baltimore, MD 21235. I am not a party to the above-entitled action. On the date set forth below, I caused a copy of the above **UNOPPOSED MOTION FOR EXTENSION OF TIME (*FIRST REQUEST*)** to be served upon the following by:

CM/ECF:

Hal Taylor, Esq.
HalTaylorLawyer@gbis.com

I declare under penalty of perjury that the foregoing is true and correct.

Dated: July 25, 2023

/s/ Zachary Berkoff-Cane
ZACHARY BERKOFF-CANE
Special Assistant United States Attorney